

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

FILED

APR 15 2010

BRENDA A. UMSTATTO
CLERK CIRCUIT COURT
COLE COUNTY, MISSOURI

CENTRAL UNITED LIFE INSURANCE)
COMPANY,)

Petitioner,)

v.)

Case No. 09AC-CC00537

JOHN M. HUFF, DIRECTOR OF THE)
DEPARTMENT OF INSURANCE,)
FINANCIAL INSTITUTIONS AND)
PROFESSIONAL REGISTRATION,)
STATE OF MISSOURI,)

Respondent.)

MOTION TO SUPPLEMENT RECORD ON REVIEW

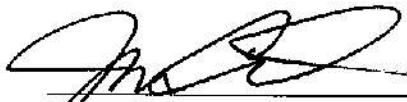
COMES NOW Respondent John M. Huff, Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration and moves the Court pursuant to § 536.130.4 RSMo 2000 for an order allowing Respondent to supplement the Record on Review in this judicial review action under § 536.100 RSMo (Supp. 2009), and in support thereof, states as follows:

1. Petitioner Central United Life Insurance Company filed the Record on Review on October 23, 2009.
2. Respondent, while preparing its brief in this matter, noted that the Petitioner's request for hearing, which precipitated the hearing before the Director below, had been inadvertently excluded from the record.
3. Respondent moves this Court for leave to file the Supplement Record on Review which will include one document, Petitioner's letter requesting a hearing pursuant to 20 CSR 100-8.018(1)(F).

4. Section 536.130 provides that this Court "may require or permit subsequent corrections of or additions to the record."
5. This request is made in the interest of justice to insure the Record on Review provides the Court the proper record from which to conduct its judicial review pursuant to § 536.140.
6. This request will not prejudice these proceedings or the Petitioner.

WHEREFORE, respondent John M. Huff, Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration moves this Court for an Order granting Respondent leave to file his Supplement Record on Review.

Respectfully submitted,



James R. McAdams

Deputy Director and General Counsel

Missouri Bar No. 33582

Tamara W. Kopp

Senior Enforcement Counsel

Missouri Bar No. 59020

Missouri Department of Insurance, Financial
Institutions & Professional Registration

301 W High Street, Room 530

Jefferson City, Missouri 65101

Telephone: (573) 751-2619

Facsimile: (573) 526-5492

**ATTORNEYS FOR RESPONDENT
DIRECTOR JOHN M. HUFF**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was mailed, postage prepaid, this 15th day of April, 2010, to:

Sherry L. Doctorian
sdoctorian@armstrongteasdale.com
Matthew D. Turner
mturner@armstrongteasdale.com
3405 West Truman Boulevard, Suite 210
Jefferson City, Missouri 65109-5713
(573) 636-8394
(573) 636-8457 (facsimile)

A handwritten signature in black ink, appearing to read "Sherry L. Doctorian", is written over a horizontal line.

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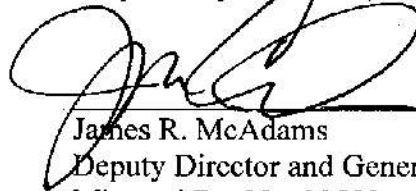
Respondent.)

SUPPLEMENTAL RECORD ON REVIEW

COMES NOW Respondent John M. Huff, Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration and files this Supplemental Record on Review in this matter pursuant to § 536.130.4 RSMo 2000.

Ex. 26: Petition to Modify Findings and Request for Hearing filed by Petitioner

Respectfully submitted,



James R. McAdams

Deputy Director and General Counsel

Missouri Bar No. 33582

Tamara W. Kopp

Senior Enforcement Counsel

Missouri Bar No. 59020

Missouri Department of Insurance, Financial
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Sherry L. Doctorian


ARMSTRONG TEASDALE LLP

MISSOURI	KANSAS	ILLINOIS	NEVADA	NEW YORK, NY	WASHINGTON, DC	SHANGHAI	SYDNEY
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ATTORNEYS AT LAW

August 13, 2009

VIA HAND-DELIVERY

John M. Huff, Director
Missouri Department of Insurance, Financial
Institutions and Professional Registration
Truman State Office Building
301 West High Street, Room 530
Jefferson City, MO 65102

RECEIVED
AUG 13 2009
MO. DEPT OF INSURANCE,
FINANCIAL INSTITUTIONS &
PROFESSIONAL REGISTRATION

**Re: Missouri Market Conduct Examination #5013-36-TGT
Central United Life Insurance Company (NAIC #65323)**

Dear Mr. Huff:

This will acknowledge receipt of your letter dated August 12, 2009, which I received by fax earlier this morning. While disappointed that our request for additional time was denied, we respect your decision.

In that our request for an extension of time was denied and pursuant to 20 CSR 100-8.010(1)(F), the company hereby petitions the department to modify the findings of the Market Conduct Exam and requests a hearing regarding same.

Very truly yours,

ARMSTRONG TEASDALE LLP



Sherry L. Doctorian

SLD/mjs

CC: Carolyn Kerr, Esq.
John McGettigan, Esq.

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